

EXHIBIT 21

**ARBITRATION PURSUANT TO
THE COMMERCIAL ARBITRATION RULES OF
THE AMERICAN ARBITRATION ASSOCIATION**

CASE NUMBER 01-21-0000-4309

BETWEEN:

Telecom Business Solution, LLC, et. al

Claimants,

-and-

Terra Towers Corp., et. al

Respondents.

**Procedural Order No. 3
(Dated August 12, 2021)**

The Tribunal adopts the Phase 1 proposal of Claimants, as the subject matter thereof is defined in the Claimants' submission dated August 6, 2021 at p. 5. We do not treat this Phase 1 as a Dispositive Motion process under Rule R-33, but instead as an exercise of our discretion under Rule R-32. The procedural timetable for Phase 1 shall be as follows:

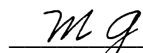
1. Concurrent Opening Memorials on September 24, 2021.
2. Concurrent Responsive Memorials on October 22, 2021.
3. Hearing if Requested by any party on November 4-5, 2021.

Any necessary adjustments of this Timetable required by schedule conflicts should be proposed to the Tribunal on or before August 16, 2021. If any party believes a non-party witness is required to be served with an Arbitral subpoena for evidence pertinent to Phase 1, that party should contact the Tribunal by August 16, 2021 in the manner specified in Procedural Order No. 2. Disclosure relevant and material to Phase 1 may be sought in the manner specified in Procedural Order No. 2.

As an additional procedural measure for good order, the Parties are directed that in addressing e-mail to the Tribunal, they include the topic(s) of the email in the Subject line of the email.

It is SO ORDERED.

August 12, 2021



Marc J. Goldstein, for the Tribunal